

August 16, 2002

To The Commission:

Regarding Petition RM-10521 to permit unlicensed operation of PMR 446 transceivers by foreign nationals transmitting in the Amateur Radio Service (ARS) 70 cm allocation in the United States, I wish to make the following comments:

1. The petitioner maintains that the proposed rule change will help promote international goodwill. While Part 97.1(e) of the Commission's regulations states that "enhancing international goodwill" is one of five fundamental purposes of Amateur Radio, it is my strong belief that this objective is truly better accomplished via international amateur-to-amateur radio communication rather than surrendering a portion of a band to unlicensed use by visiting foreigners.
2. Often an investment of time and money to install a given VHF/UHF Amateur station is based on obtaining a coordinated frequency or frequencies. The Amateur 70 cm band segment (445.00-447.00 MHz) affected by the Petition is recommended for auxiliary stations and repeater control links, as well as simplex communications, according to the ARRL band plan. If implemented, the Petition will potentially force existing coordinated channel users to move (if feasible) to other frequencies at the expense of the Amateur licensee. Furthermore, there is the potential of disruption to Amateur communications while station redeployment is taking place. I believe these are unnecessary burdens on the Amateur Radio Service given the benefits purported by the Petition.
3. There are output power limitations specifically imposed on Amateur Radio operation on the 70 cm band within areas around designated military installations in the US. The affected areas include all of Florida and Arizona, and portions of New Mexico, Texas, California, Nevada, Massachusetts, Alaska, North Dakota, Alabama, Georgia, and South Carolina. While the RF power output of the Personal Mobile Radios which are the subject of the Petition is substantially lower than this limitation, as unlicensed devices I believe there will be only limited control by the government over the application of these radios. Further, I believe the uncontrolled use of such RF emitters, particularly in those geographic areas where a real potential for RF interference to US military installations exists, should be given very serious consideration before being sanctioned by the FCC.

I urge the Commission to deny petition RM-10521.

Yours truly,

Wayne C. Greaves